18-ARB-5 Pleadings / Documents to be filed under seal

Sent: Monday, May 24, 2021 2:54 PM

From: Samantha Kumaran samantha@timetricsrisk.com

To: Daryl Schumacher dschumacher@ksrlaw.com, Martin Doyle mdoyle@ksrlaw.com

CC: Brian August bmaugust61@gmail.com

Dear Daryl,

Pursuant to the recent Court Order for Defendant to file the 18-ARB-5 Arbitration pleadings I have gone through the outgoing complaint that was filed on Jun 8, 2018. Since the NFA Arbitration was based on paper filing (meaning it was filed using hard-copies and Fedex - and not electronically), I was never sent a copy of what was actually sent in service - I want to make sure our record of the pleadings matches and that you have notice on the exact documents we seek redacted. I have therefore attached to this email the exact 2 documents (*Appendix_Exhibits and "Appendix_C_Supplement_Exhibits) that we are requesting to be filed under seal, that contains our confidential and commercially sensitive account data and financial information. I have also attached below a table of what was sent in the outgoing pleading.

The 2 documents attached contain Plaintiffs commercially sensitive and highly sensitive information financial data that we ask to be redacted and filed under seal. I will also be filing a letter motion to redact those 2 documents.

Here is a table of the remaining documents we have that were contained in Jun 8 2018 outbound filing

Outbound Pleadings in 18-ARB-5 Document ID		
Master Summary Claim	42 pages –Summary Complaint	No redactions
Appendix A	65 pages – Rules violated	No redactions
Appendix 1	200 pages - Timeline	No redactions
Appendix B	14 pages – Heating Oil Errors	No redactions
Appendix C	24 pages – Crude Oil Errors	No redactions (Except Appendix_C_Exhibits **Financial paper exhibits filed as C19, C24 and C25 attached to back redacted filed under seal)
Appendix H	9 pages - Anti Money Laundering Errors	No redactions
Appendix K	Claims table	No redactions
Appendix Exhibits**	160 pages, including screenshots and financial data from NRCM's accounts	COMMERCIALLY SENSITIVE AND TRADE SECRET **Contains account data

We please ask that you also send us a copy of the pleadings or letters that you intend to file (before hand) so that we may identify if it contains

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commercially sensitive information before filing on the docket. As of now, based on our own records above, the two 2 files attached (**Appendix_Exhibits** and **Appendix_C_Supplemental_Exhibits**) from the attached table are requested to be filed under seal for SELECT PARTIES under ECF filing. This is consistent with Hon. Judge Greg Wood Individual Rules 4 (a) for protecting trade secrets and/or when another party (Plaintiffs) assert the documents contains their own financial and commercially sensitive information.

If ADMIS has any redactions of confidential data (above ours) we do not object to you filing additional information under seal pending any motion or order related to redaction.

Thank you for your cooperation. If you have any questions or comments please contact me before Wednesday.

Kind regards, Samantha S. Kumaran President and CEO <u>samantha@timetricsrisk.com</u> Phone: 212 431 5098 (Office) Mobile: 917-636-1364 (Cell)

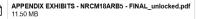


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